

From: [Terry Andrews](#)
To: [Moore, Gary](#)
Subject: FW: Stormwater situation at the CES Facility
Date: Wednesday, September 03, 2014 10:41:24 AM

Gary,

This is the info that he mentions in the last email that I sent you.

Terry

From: Gary Fogarty
Sent: Wednesday, September 03, 2014 9:02 AM
To: Terry Andrews; Elizabeth Sears
Cc: Barbara Sullivan; Steve Smith; Nicole Bealle; Rebecca Villalba
Subject: RE: Stormwater situation at the CES Facility

Terry: My last investigation of the CES facility resulted in an EAR for failing to obtain the proper TPDES Permit. The facility was (is) a Centralized Waste Treatment Facility that had been subject to applicable pretreatment standards for 40 CFR Part 437-CWT; Subparts A,B, and C. (Metal bearing, oil bearing, and organic chemical bearing wastestreams.) Since the storm water would likely contain contaminants from any of these wastestreams, the storm water should likely be subject to the new source performance standards (effluent limits) contained in 40 CFR 437.45(b) which is a combination of the effluent limits for subparts A, B, and C. Any discharge should include being subject to any applicable stream standards.

The industrial permit section should be able to determine the pollutants of concern that need to be monitored for in the discharge.

Gary

From: Terry Andrews
Sent: Tuesday, September 02, 2014 10:34 AM
To: Elizabeth Sears; Gary Fogarty
Subject: Stormwater situation at the CES Facility

Good Morning,

We've got a situation brewing at the CES facility that I wanted you to know about. The CES Environmental Services, Inc. (CES) site is located at 4904 Griggs Road, Houston. CES went bankrupt in 2010 and the bankruptcy trustee has been trying to get the site cleaned up. However, we still have waste at the site and lately we're had a stormwater problem. The City of Houston had the facility plug its storm water drain years ago and the water has nowhere to go, except to run onto Griggs street to the North and to residential properties to the South. The TCEQ ER folks recently built a berm on the Southwest corner of the site that has ponded the stormwater, but with all the rain, there is only one foot of freeboard left and there is more rain in the forecast. The stormwater has an oily sheen on it. The water has been tested during previous stormwater events and has had some low levels of hydrocarbons.

The EPA Emergency Response folks are on site and are currently talking with the City about the situation. They do not want to let the stormwater get over the berm and onto the residential properties again (happened a few weeks ago). The EPA is thinking about setting up a water treatment system and then discharging to the City storm drain. What permissions can we give to help this happen? Thoughts?

Thanks,

Terry (3560 or 832-392-0437)